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REMARKS

1.   The claimed equation DOES impose structural limitations

The primary flaw in the Examiner's reasoning is the maintenance of the position that Applicants' equation is "deemed not to impose any structural limitations on the claims distinguishable over the Taylor et al.'s device" and that the "claim limitations do not require that the spaces between all attachment structures are equal." That is incorrect.

$$d - 1\left(\sqrt{\frac{1}{\tan^2\left(\frac{a}{2n}\right)} + 1}\right)$$

The equation of claim 1 (reproduced above for convenience) specifically defines the claimed spacing. The specification states that "*the distance between holes 14 is measured by the chord length l_{chord} and such lengths are equal.*" See col. 4, lines 44-47. The specification further states that "[u]sing the relationship defined in [the claimed equation], a system of rings including a variety of ring diameters can be developed wherein each ring has triple symmetry and *the hole spacing for each ring is the same.*" *See* col. 6, lines 14-17. An example follows in the table on column 4.

Nonetheless, in an abundance of cooperation and in the interest of advancing this application to issuance, Applicants proposed amending claim 1 to clarify and positively claim that the chord length between adjacent attachment structures is substantially equal between all attachment structures. The present amendment to claim 36 also clarifies that, even when the equation is not a part of the claim, the structures are substantially equally spaced apart.

Claim 45 as currently amended focuses on the geometrical relationship of the attachment structures, a relationship not shown or described by the Taylor '095 patent. When the Taylor '095 ring is rotated 120°, its holes do not maintain the same geometrical arrangement. This can easily be see by cutting the second Figure 2 reproduced in the

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Examiner's Advisory Action off of the page, placing it over the first Figure 2, and rotating it 120°. This crude example shows clearly the holes do not line up, *i.e., they do not exhibit the same geometrical arrangement.*

2. The '095 patent plate does not provide 2 x 3 symmetry

The drawing reproduced on page 3 of the Advisory Action does not show 2x3 symmetry. It appears that the Examiner misunderstands the term as used in the specification. As described in the specification at col. 4, lines 10-41, 2x3 symmetry means that the plate can be rotated 180° about a first axis (e.g., flipped over so that the top is on the bottom) and rotated in increments of 120° about a second axis (e.g., rotated 1/3 of the way about a circle), and each time, identical attachment structure positions are maintained. By contrast, Applicants have clearly shown that the device shown and described by the Taylor '095 patent *does not have a hole spacing that meets the equation (of claim 1) or that meets the spacing and size (of claim 36) or that meets the geometrical arrangement (of claim 45).* As shown below, if Figure 2 of the Taylor '095 patent is flipped 180° and rotated 120°, it does not maintain identical hole spacing.
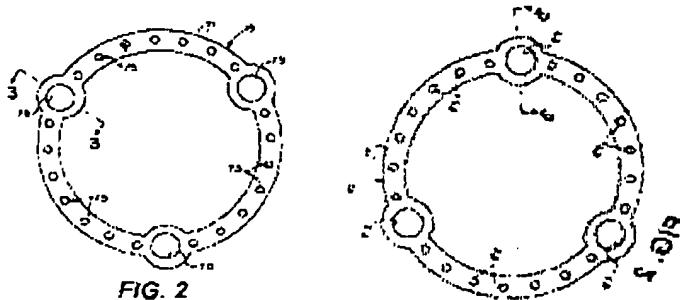
FIG. 2

CONCLUSION

For at least the above reasons, Applicants respectfully request allowance of claims 1-14 and 36-48 and issuance of a patent containing these claims in due course. If there remain any additional issues to be addressed, the Examiner is urged to contact the undersigned attorney at 404.815.6147.

Respectfully submitted,
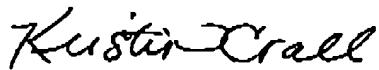
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